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Attorney for Defendant
ISAAC RAMIREZ-MARQUEZ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. ROGER T. BENITEZ)

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|---|---|
| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>v.<br><br>ISAAC RAMIREZ-MARQUEZ (3),<br><br>Defendant. | Criminal Case #: **08CR0095-BEN**<br><br>Date: **September 15, 2008**<br>Time: **2:00 p.m.**<br><br>**NOTICE OF MOTION AND MOTIONS TO/FOR:**<br>**1) COMPEL DISCOVERY and**<br>**2) FILE FURTHER MOTIONS** |

PLEASE TAKE NOTICE that on MONDAY, SEPTEMBER 15, 2008, at 2:00 p.m., the defendant, ISAAC RAMIREZ-MARQUEZ, by and through his counsel, KENNETH J. TROIANO, will bring the below listed motions.

**MOTIONS**

The defendant, ISAAC RAMIREZ-MARQUEZ, hereby moves the Court pursuant to the Federal Rules of Criminal Procedure, the United States Constitution, and all other statutes and related case law, to/for:

1) Compel the government to provide discovery of any and all evidence that is discoverable under Rule 16(a)(1)(A)-(E), Brady v. Maryland, and Giglio v. United States;

2) Leave to file further motions based on discovery received.

Respectfully submitted,

Dated: AUGUST 29, 2008

s/Kenneth J. Troiano
Kenneth J. Troiano
Attorney for Defendant
ISAAC RAMIREZ-MARQUEZ

**Proof of Service**

I, Kenneth J. Troiano, declare as follows:

That I am a citizen of the United States and resident of the County of San Diego, State of California; I am over the age of 18 years and not a party to the within action; my business address is: 3200 Fourth Avenue, Suite 208, San Diego, California 92103, with a mailing address of P.O. Box 33536, San Diego, California 92163, telephone number: (858) 268-8600.

That on August 29, 2008, I caused to be filed in the United States District Court for the Southern District of California and served on respective counsel the Defendant's Notice of Motions and Motions 1) To Compel Discovery, 2) For Leave to File Further Motions, along with a Statement of Facts, Memorandum of Points and Authorities, and Exhibits in *United States v. Isaac Ramirez-Marquez, 08CR0095-BEN-03,* as follows:

1) U.S. District Court (E-File) (Additional Courtesy Copy Mailed)
2) Assistant U.S. Attorney Stewart Michael Young - stewart.young@usdoj.gov, lilian.ruiz@usdoj.gov, efile.dkt.gc1@usdoj.gov
3) Assistant U.S. Attorney - Fred A. Sheppard - fred.sheppard@usdoj.gov, efile.dkt.gc1@usdoj.gov, virginia.guiab@usdoj.gov
4) Benjamin P Lechman - benlechman@hotmail.com
5) Wayne Charles Mayer - wcmayer@aol.com
6) Gayle J Mayfield-Venieris - federal@mayfield-law.com,mayfieldlaw@gmail.com
7) Leila W Morganv - Leila_Morgan@fd.org; Angelica_Hernandez@fd.org
8) Merle N Schneidewind - atymerle@pacbell.net

I certify under penalty of perjury that the foregoing is true and correct.

Executed on August 29, 2008 at San Diego, California.

*s/Kenneth J. Troiano*
Kenneth J. Troiano
Declarant